REMARKS

Applicants wish to thank Examiners Sterrett and Jeanty for the courtesies extended to Applicants' representative during the telephone interview on February 9, 2006. At the interview, the rejections in the outstanding Office Action were discussed. Additionally, the Examiner agreed to reconsider the presently imposed rejections in view of the arguments presented during the interview and set forth below.

In the Office Action, the Examiner rejected claims 1-13, 17-21, 26-33, 37-47 and 51-55 under 35 U.S.C. § 103(a) as being unpatentable over White (White, VIT SeeChain Portal: An Information Portal for the Enterprise, Database Associates International, Inc. Version 2, August 1999) in view of PR Newswire (PR Newswire, VIT Announces SeeChain™ Product Line – Five Supply Chain Performance Applications, PR Newswire, New York, 14 June 1999); and rejected claims 14-16, 22-25, 34-36, 48-50 and 56-65 under 35 U.S.C. § 103(a) as being unpatentable over White and PR Newswire in view of Flores et al. (U.S. Patent No. 5,630,069).

By this Amendment, Applicants have added new claim 66. Accordingly, claims 1-66 are currently pending in this application. In addition, Applicants respectfully traverse the outstanding rejections and request reconsideration in view of the following remarks.

I.   The Rejection of Claims 1-13, 17-21, 26-33, 37-47, and 51-55

To establish a *prima facie* case of obviousness under § 103, the Examiner must demonstrate that (1) the references disclose or suggest each and every element recited in the claims; (2) there is a reasonable probability of success of any modification of the teachings of the references, and (3) there exists some suggestion or motivation, either

in the teachings of the references themselves or in the knowledge generally available to one of ordinary skill in the art, to make such a modification in a manner resulting in the claimed invention. M.P.E.P. § 2143. In this case, however, a *prima facie* case of obviousness has not been established.

Claim 1 is directed to a computer-implemented method for assisting collaboration between participants in a business community. The method includes "providing on a display device coupled to a data processing system a business view depicting a plurality of interlocked polygons illustrating interactions between the participants, the polygons being positioned relative to each other to define the participants for the interaction; identifying interaction data including at least one of roles of the participants and information flow between the participants; and electronically deriving an interaction view from the business view using said data processing system, the interaction view being provided on the display device and depicting the interaction data." None of the applied references teaches or suggests this combination of features.

For example, White does not teach or suggest "providing . . . a business view depicting a plurality of interlocked polygons illustrating interactions between the participants, the polygons being positioned relative to each other to define the participants for the interaction," as recited in claim 1 (emphasis added). During the interview, the Examiner acknowledged that, in contrast to the Examiner's position on page 2 of the outstanding Office Action, the claimed invention cannot be interpreted as only a picture or graph with drill down features displayed on a computer. Indeed, since White fails to teach or suggest "a plurality of interlocked polygons illustrating interactions between the participants, the polygons being positioned relative to each other to define

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the participants for the interaction" as required by claim 1, <u>White</u> cannot render claim 1 obvious.

Similarly, <u>White</u> does not teach or suggest "identifying interaction data including at least one of roles of the participants and information flow between the participants." The Office Action alleges that <u>White</u> teaches this feature, pointing to paragraphs 31 and 32 of <u>White</u>:

> White teaches the Browse interface enables users to navigate the Business Information Directory (BID) by drilling down through collections by subject area and topic. The Kview interface displays information in the BID. This interface offers the advantages of faster navigation, information in context, and the ability to display more information on the user's screen. The flexible architecture of the VIT SeeChain Portal enables it to be used for a wide variety of applications, ranging from the enterprise-wide monitoring of business processes to the exchange of information between trading partners.

(Office Action at 6-7.) However, these teachings are insufficient to teach or suggest "identifying interaction data including at least one of roles of the participants and information flow between the participants," as recited in claim 1. Applicants submit that "applications ranging from the enterprise-wide monitoring of business processes to the exchange of information between trading partners" cannot constitute information flow between the participants. As noted in Applicants' specification at page 9, line 3, information flow "relates to information movement between activities." Therefore, the "monitoring of business processes to the exchange of information between trading partners" cannot constitute "identifying interaction data including at least one of roles of the participants and information flow between the participants," as recited in claim 1.

Furthermore, PR NewsWire does not cure the deficiencies of White. That is,

PR Newswire also fails to teach or suggest at least a "business view depicting a plurality

of interlocked polygons illustrating interactions between the participants, the polygons

being positioned relative to each other to define the participants for the interaction" and

"identifying interaction data including at least one of roles of the participants and

information flow between the participants," as recited in claim 1.

For at least these reasons, White and PR Newswire, when considered alone or in

combination, fail to teach each and every recitation of claim 1. Accordingly, Applicants

respectfully request that the rejection of claim 1 under 35 U.S.C. § 103(a) be withdrawn

and the claim allowed.

Independent claims 6, 21, 26, 40, and 55 include features similar to those in

claim 1 and are believed to be allowable over White and PR Newswire for at least the

same reasons as set forth above with respect to claim 1. Applicants, therefore, request

the Examiner to withdraw the rejection of claims 6, 21, 26, 40, and 55.

Claims 2-5, 7-13, 17-20, 27-33, 37-39, 41-47 and 51-54 depend from claims 1, 6,

26, or 40 and are thus allowable for at least the reasons set forth above. Moreover,

none of the applied references, either singly or in combination, teaches or suggests the

additional features recited in claims 2-5, 7-13, 17-20, 27-33, 37-39, 41-47 and 51-54.

Applicants, therefore, respectfully request that the rejection of these claims under

35 U.S.C. § 103(a) be withdrawn and the claims allowed.

II. The Rejection of Claims 14-16, 22-25, 34-36, 48-50 and 56-65

Claim 24 is directed to a method for creating a collaboration between participants

in a business scenario and recites a combination of features including "accepting, into a

data processing system," certain kinds of information and "creating a collaboration for

sharing a portion of the information accepted." None of the applied references, teaches

or suggests, either singly or in combination, at least this combination of features.

For example, the applied references do not teach or suggest "accepting, into a

data processing system, information . . . identifying at least one of roles of the

participants and information flow between the participants," as recited in claim 24.

Similarly, the applied references fail to teach or suggest information "identifying system

requirements used to implement the collaborative business," as recited in claim 24. The

Office Action alleges that this element is taught by White, pointing to paragraphs 5, 9,

22, 24, and 32:

> White teaches components of an enterprise information
> portal to include a Web browser, Web server, Decision
> processing systems, Collaborative processing systems, and
> other corporate systems. The knowledge view (Kview)
> interface of SeeChain Portal is employed to locate and
> display information. The hyperbolic tree is organized by
> subject area, topic, and collection. The ability to define meta
> data relationships with the BID, and the meta data
> interchange hub, enables an organization to document and
> track the complete flow of information from transactional
> processing systems to decision and collaborative processing
> systems. The flexible architecture of the VIT SeeChain
> Portal enables it to be used for a wide variety of applications,
> ranging from the enterprise-wide monitoring of business
> processes to the exchange of information between trading
> partners.

(Office Action at 19.) However, these teachings are insufficient to teach or suggest

"accepting, into a data processing system, information . . . identifying system

requirements used to implement the collaborative business," as recited in claim 24

because White merely shows what components are used in a enterprise information

portal and a hyperbolic tree interface to display information. White is silent as to

"accepting, into a data processing system, information . . . identifying system requirements used to implement the collaborative business," as recited in claim 24. Furthermore, PR Newswire and Flores et al. do not cure the deficiencies of White. Indeed, the Office Action acknowledged that Flores et al. is silent as to this feature. (Office Action mailed on December 7, 2004 at 11).

Because none of the applied references, either singly or in combination, teaches or suggests the features of claim 24, Applicants request that the rejection of claim 24 under 35 U.S.C. § 103(a) be withdrawn and the claims allowed.

Independent claims 58 and 62 recite a combination of features. For example, claim 58 recites a combination of features including providing on a display device coupled to a data processing system, a *first view* showing the participants, interactions between the participants, and defining the participants for the interactions; providing on the display device, using the data processing system, a *second view* showing a sequence of the interactions; and providing on the display device, using the data processing system, a *third view* showing a system topology used by each participant. Nothing in White, PR Newswire, or Flores et al. teaches or suggests at least these features.

The Examiner alleges that White teaches the claimed third view by disclosing "the ability to define meta data relationships with the BID, and the meta data interchange hub, enables an organization to document and track the complete flow of information from transactional processing systems to decision and collaborative processing systems." (Office Action at 19.) Further, the "Examiner interprets White to suggest information flow is understood down to the system level" (Id.) Even assuming

that the Examiner's characterization of White is accurate, the Examiner has failed to

show a teaching of a view showing a system topology used by each participant as

required by the claims. That is, a teaching of the ability to define meta data

relationships, to document and track the complete flow of information, even if system

level, is insufficient to meet a "*third view* showing a system topology used by each

participant" (emphasis added).

The Examiner alleges that FIG. 3 of White discloses the claimed third view. (Id.)

However, as admitted by the Examiner, White discloses maintaining meta data that

describes how business information is related to other information objects in the

business information supply chain. (White, paragraph 9). However, White is silent as to

a "view showing a system topology used by each participant," as recited in claim 58.

That is, relationships between business information and other information objects

cannot constitute a system topology used by each participant. Neither PR Newswire or

Flores et al. cure the deficiencies of White. Accordingly claim 58 and claim 62, which

recites similar features to claim 58, are also allowable over the cited references.

Claims 14-16, 22-23, 25, 34-36, 48-50, 56-57, and 63-65 depend from claims 6,

21, 26, 40, 55, or 62 and are also allowable at least for the same reasons set forth

above for claims 6, 21, 26, 40, 55, or 62. Moreover, they are allowable because they

contain additional features not taught or suggested by the applied references.

Applicants, therefore, respectfully request that the rejection of these claims under

35 U.S.C. § 103(a) be withdrawn and the claims allowed.

III. New Claim 66

New independent claim 66 is believed to be also allowable over the applied references because none of those references teaches or suggests the features recited in that claim. Applicants, therefore, request that the Examiner allow claim 66 also.
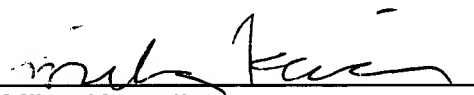
IV. Conclusion

In view of the foregoing remarks, Applicants submit that the claimed invention is neither anticipated nor rendered obvious in view of the prior art references cited against this application. Applicants therefore request the entry of this Amendment, the Examiner's reconsideration and reexamination of the application, and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,
FINNEGAN, HENDERSON, GARABOW,
GARRETT & DUNNER, L.L.P.

Dated: March 6, 2006   By:_____
                                Milan Kapadia
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